

March 24, 2006

The Honorable Kevin J. Martin, Chairman
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20004

Re: *WT Docket Mo. 02-353; Au Docket No. 06-30; WT Docket No. 05-211*
Proposal for Concealed Bidding in Advanced Wireless Services
*("AWS") Auction -- Auction No. 66; **EX PARTE***

Dear Chairman Martin:

We write as leaders of U.S. wireless companies or financial entities preparing to potentially participate in the Commission's upcoming auction of Advanced Wireless Services ("AWS") spectrum. We are deeply concerned that the Commission intends to depart from the transparency that historically has been a hallmark of its spectrum auction methodology to impose a "concealed bidding" regime, which would dramatically reduce competitive information available to bidders during the auction. We strongly urge the Commission not to make this change.

The Commission's current simultaneous multiple round ("SMR") methodology has been thoroughly "road tested" and is well understood by our industry. The SMR format has provided both small and large bidders with a high degree of flexibility to consider and bid on a variety of license aggregation alternatives. And to date, there has been virtually no empirical evidence submitted into the record to support the notion that the transparency of SMR auctions has either reduced auction revenues or harmed auction efficiency.

In contrast, by imposing blind bidding, the Commission will introduce an enormous amount of uncertainty into the auction, which will, in our view, directly affect our companies' risk and level of participation – and, therefore, the ultimate success of the auction.

Any major change to the auction rules at this juncture is problematic in itself, given the industry's comfort level with the SMR methodology and the imminence of the June 29 auction date. But a change that reduces transparency in the auction process is particularly troubling. It is very important for our companies as potential bidders or financing sources to be able to assess as much information regarding licensed markets as possible, including the identity, size and technological configurations of our competitors. The lack of such information, in our

view, will greatly increase our companies' risk of sub-optimal license purchases. It also will likely directly affect many of our companies' access to capital to fund the acquisition of spectrum licenses, since lenders and financing sources share the identical concerns, as well as funds available for post-auction build-out depending on who owns licenses in markets when identities are ultimately revealed.

The AWS auction is the most significant CMRS auction in a decade in terms of the number of licenses to be auctioned, total spectrum available, and projected auction revenues. It simply is too fundamentally important to the U.S. wireless industry to risk experimentation with concealed bidding, especially when only theoretical concerns underlie the proposed change.

The FCC should auction AWS licenses in a single auction with full transparency as to license selections, upfront payments, and round-by-round results, as it has done for more than a decade. To do otherwise for this auction will not serve the public interest.

-/s/-

Michael J. Small
Chief Executive Officer
CENTENNIAL COMMUNICATIONS, INC.

-/s/-

Paul Roth
Executive Vice President
External Affairs and Public Relations
CINGULAR WIRELESS LLC

-/s/-

Matthew Newton
Partner
COLUMBIA CAPITAL, LLC

-/s/-

Rocky Crossland
Chief Executive Officer
CLEVELAND UNLIMITED, INC. D/B/A
REVOL

-/s/-

James F. Wade
Managing General Partner
M/C VENTURE PARTNERS

-/s/-

Everett R. Dobson
Chairman of the Board
DOBSON COMMUNICATIONS
CORPORATION

-/s/-

Barry B. Lewis
President
3G PCS, LLC

-/s/-

S. Douglas Hutcheson
President and Chief Executive Officer
LEAP WIRELESS INTERNATIONAL, INC.

-/s/-

John E. Rooney
President and Chief Executive Officer
UNITED STATES CELLULAR
CORPORATION

-/s/-

Roger D. Linquist
President, Chief Executive Officer, and
Chairman of the Board
METROPCS COMMUNICATIONS, INC.

The Honorable Kevin J. Martin, Chairman
March 24, 2006
Page 3

-/s/-

Kenneth C. Johnson

Counsel

THE RURAL TELECOMMUNICATIONS
GROUP, INC.

cc: Honorable Michael J. Copps
Honorable Jonathan S. Adelstein
Honorable Deborah T. Tate